

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA

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LAKESHIA AARON,

Plaintiff,

Civil Action

File No.:

TREY GRANGER, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

v.

2:23cv374-CW13

TERESA L. FERRELL a/k/a  
TERESA L. BRIGGS,,

Defendant.

**COMPLAINT FOR DAMAGES**

COMES NOW, LAKESHIA AARON, Plaintiff in the above styled action,  
and files this Complaint for Damages against Defendant TERESA L. FERRELL  
a/k/a TERESA L. BRIGGS, and shows the Court as follows:

**PARTIES**

1.

Plaintiff LAKESHIA AARON (hereinafter referred to as "Plaintiff") is a  
citizen and resident of the State of Alabama, domiciled in Montgomery County,  
Alabama.

2.

Defendant TERESA L. FERRELL a/k/a TERESA L. BRIGGS (hereinafter  
referred to as "Defendant Ferrell") is a citizen and resident of the State of

Alabama, domiciled in Montgomery County, Alabama. Defendant Ferrell may be served with process at 3463 Le Bron Road, Montgomery, Alabama 36111. Once Defendant has been so served, she will be subject to the jurisdiction of this Court.

### **JURISDICTION AND VENUE**

3.

Jurisdiction over Defendant is proper pursuant to 28 U.S.C. § 1331.

4.

Venue is proper in this district pursuant to 28 U.S.C. § 1391.

### **STATEMENT OF FACTS**

5.

Plaintiff was previously in a relationship with Jasper Thornton.

6.

During Plaintiff's relationship with Jasper Thornton, she shared a video that contained intimate visual depictions of Plaintiff with Jasper Thornton.

7.

These intimate visual depictions were intended for the intimate private enjoyment of Jasper Thornton and were not intended for distribution to anyone other than Jasper Thornton.

8.

Jasper Thornton later became involved a relationship with Defendant Ferrell.

9.

Upon information and belief, Defendant Ferrell obtained intimate visual depictions of Plaintiff from her boyfriend Jasper Thornton.

10.

On or about October 11, 2022, Defendant Ferrell disclosed the intimate visual depictions of Plaintiff to Erasasai Noden through Facebook Messenger.

11.

Plaintiff did not consent to this disclosure.

12.

In the alternative, Defendant Ferrell acted with reckless disregard as to whether Plaintiff had consented to such disclosure.

13.

Defendant Ferrell used a means or facility of interstate or foreign commerce to disclose the intimate visual depictions of Plaintiff when she used the internet and cellular networks to disclose photos and/or videos which contained intimate visual depictions of Plaintiff.

**CAUSE OF ACTION**  
**Civil action relating to disclosure of intimate images**  
**15 U.S.C. § 6851**

14.

Plaintiff repeats and incorporates by reference each and every allegation set forth above, as though fully set forth here.

15.

On or about October 11, 2022 Defendant Ferrell disclosed the video which contained intimate visual depictions of Plaintiff to Erasasi Noden through Facebook Messenger.

16.

Defendant used a means or facility of interstate or foreign commerce to disclose the intimate visual depictions of Plaintiff when she used the internet and cellular networks to disclose video which contained an intimate visual depiction of Plaintiff.

17.

Plaintiff did not consent to this disclosure.

18.

In the alternative, Defendant acted with reckless disregard as to whether Plaintiff had consented to such disclosure.

19.

Plaintiff has suffered damages as a result.

20.

Plaintiff is entitled to liquidated damages in the amount of \$150,000.00 against Defendant Ferrell for this disclosure, and the cost of the action, including reasonable attorney's fees and other litigation costs reasonably incurred pursuant to 15 U.S.C. § 6851(b)(3)(i).

21.

Plaintiff is also entitled to equitable relief, including a permanent injunction ordering the Defendant to cease all display or disclosure of the visual depiction pursuant to 15 U.S.C. § 6851(b)(3)(ii).

WHEREFORE, Plaintiff prays for judgment in her favor and against each Defendant and for the following relief:

- A. Finding Defendant liable under 15 U.S.C. § 6851;
- B. Awarding Plaintiff liquidated damages in the amount of \$150,000 against Defendant, and the cost of the action, including reasonable attorney's fees and other litigation costs reasonably incurred pursuant to 15 U.S.C. § 6851(b)(3)(i);
- C. Granting appropriate injunctive relief against Defendant pursuant to 15 U.S.C. § 6851(b)(3)(ii); and

- D. Awarding such other and further available relief and any other relief the Court deems just and appropriate.

**JURY DEMAND**

Plaintiff hereby demands a trial by jury on all issues so triable.

This the 6th day of June, 2023.

/s/ Joseph W. Weeks

Joseph W. Weeks

Appearing *Pro Hac Vice* for Plaintiff  
(*Pending*)

Georgia Bar No. 912341

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